

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES FIDELITY AND
GUARANTY COMPANY,

Plaintiff,

v.

Civil Action No. 05-11397-NMG

PAUL A. BORDIERI and ANDREA
COSTA, TRUSTEES OF JACKSON
CONSTRUCTION COMPANY, PAUL A.
BORDIERI, INDIVIDUALLY,

Defendants,

and

SOVEREIGN BANK OF NEW
ENGLAND, N.A., APPLETON
PARTNERS, INC. and CAMBRIDGE
APPLETON TRUST, N.A.,

Trustee Process Defendants.

ANSWER OF TRUSTEE PROCESS DEFENDANT APPLETON PARTNERS, INC.

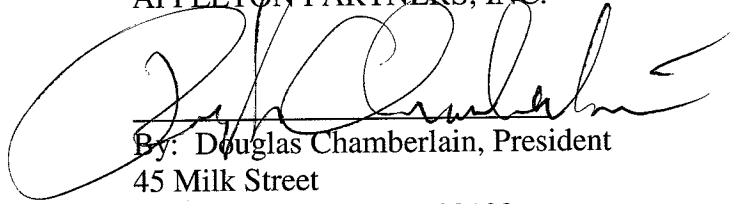
Pursuant to Rule 64 of the Federal Rules of Civil Procedure and Rule 4.2 of the Massachusetts Rules of Civil Procedure, trustee process defendant Appleton Partners, Inc. ("Appleton Partners") answers the Summons to Trustee dated July 7, 2005 and served upon it by Plaintiff United States Fidelity and Guaranty Company ("USF&G").

As of the date of service of the Summons to Trustee, Appleton Partners had no funds in the name of defendant Jackson Construction Company in its hands, possession, or control, not otherwise exempt. As of the date of service of the Summons to Trustee, Appleton Partners had

funds with a value of \$2,380,471 in the name of defendant Paul A. Bordieri in its hands, possession, or control, in account number A0086, not otherwise exempt.

Signed under the pains and penalties of perjury this 1st day of August, 2005.

APPLETON PARTNERS, INC.

A large, stylized handwritten signature in black ink, appearing to read 'Douglas Chamberlain', is written over the printed name and title.

By: Douglas Chamberlain, President
45 Milk Street
Boston, Massachusetts 02109

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Attorneys for Trustee Process Defendant
APPLETON PARTNERS, INC.

Dated: August 1, 2005